

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
DPH HOLDINGS CORP, et al.,	:	Case No. 05-44481 (RDD)
	:	(Jointly Administered)
Reorganized Debtors.	:	
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DELPHI AUTOMOTIVE SYSTEMS, LLC,	:	Adv. Pro. No. 07-02688 (RDD)
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
THE TIMKEN COMPANY and THE	:	
TIMKEN CORPORATION,	:	
	:	
Defendants.	:	
-----	X	

**DECLARATION OF JAMES SULLIVAN IN SUPPORT OF OPPOSITION OF THE
TIMKEN COMPANY AND THE TIMKEN CORPORATION TO REORGANIZED
DEBTORS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINTS**

Michael Hart, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a partner at Moses & Singer LLP. I represent The Timken Company and The Timken Corporation (collectively "Timken") in connection with the above referenced adversary proceeding.
2. I submit this declaration in support of the Timken's opposition to the Reorganized Debtors' (the "Reorganized Debtors") Motion for Leave to File Amended Complaints.
3. I have personal knowledge of the facts set forth in this Declaration and, if called to testify, I could and would testify competently concerning those facts.
4. Attached hereto as Exhibit A is an email dated October 19, 2010 that I sent to Eric Fisher of Butzel Long, counsel for the Reorganized Debtors.

5. Attached hereto as Exhibit B is a follow-up email dated October 26, 2010 that I sent to Eric Fisher of Butzel Long, counsel for the Reorganized Debtors.

6. Attached hereto as Exhibit C is an email dated October 26, 2010 that I received from Eric M. Mathis of Butzel Long in response to my October 19, 2010 email to Eric Fisher.

7. I have received no further response to the inquiries I made in my October 19, 2010 and October 26, 2010 emails.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 24th day of November, 2010 at New York, New York.

/s/ James Sullivan

James Sullivan